

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:	)	Chapter 9
	)	
CITY OF DETROIT, MICHIGAN,	)	Case No. 13-53846
	)	
Debtor.	)	Hon. Steven W. Rhodes
	)	

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**STIPULATION TO ENTRY OF PROTECTIVE ORDER**

The City of Detroit, Michigan, the Police and Fire Retirement System of the City of Detroit, the General Retirement System of the City of Detroit and the COPs Holders<sup>1</sup> stipulate to entry of the Protective Order attached as Exhibit 1 hereto.

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<sup>1</sup> The COPs Holders include the following: (1) Hypothekenbank Frankfurt AG, Hypothekenbank Frankfurt International S.A., and Erste Europäische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A., (2) FMS Wertmanagement, and (3) the Ad Hoc COPs Holders, as disclosed on Exhibit 1 to the Verified Statement Pursuant to Rule 2019 filed on August 16, 2013 [Dkt. No. 359].

Stipulated and agreed to by:

JONES DAY

/s/ Evan Miller

Evan Miller  
51 Louisiana Ave., N.W.  
Washington, D.C. 20001  
Telephone: (202) 879-3939  
emiller@jonesday.com

and

David G. Heiman (OH 0038271)  
Heather Lennox (OH 0059649)  
North Point  
901 Lakeside Avenue  
Cleveland, Ohio 441144  
Telephone: (216) 586-3939  
Facsimile: (216) 579-0212  
dgheiman@jonesday.com  
hlennox@jonesday.com

and

Jonathan S. Green (MI P33140)  
MILLER, CANFIELD, PADDOCK  
AND STONE, P.L.C.  
150 West Jefferson, Suite 2500  
Detroit, Michigan 48226  
Telephone: (313) 963-6420  
Facsimile: (313) 496-7500  
green@millercanfield.com  
laplante@millercanfield.com

*Counsel to the City of Detroit,  
Michigan*

CLARK HILL PLC

/s/ Robert D. Gordon

Robert D. Gordon (P48627)  
Shannon L. Deeby (P60242)  
151 South Old Woodward Avenue  
Suite 200  
Birmingham, Michigan 48009  
Telephone: (248) 988-5882  
Facsimile: (248) 988-2502  
rgordon@clarkhill.com  
sdeeby@clarkhill.com

*Counsel to the Police and Fire  
Retirement System of the City of Detroit  
and the General Retirement System of  
the City of Detroit*

/s/ Howard S. Scher

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Howard S. Scher, Esquire  
Jacob & Weingarten, P.C.  
Somerset Place  
2301 W. Big Beaver Road, Suite 777  
Troy, Michigan 48084  
Tel: (248) 649-1200  
Fax: (248) 649-2920  
howard@jacobweingarten.com

Vincent J. Marriott, III, Esquire  
Ballard Spahr LLP  
1735 Market Street, 51st Floor  
Philadelphia, Pennsylvania 19103  
Tel: (215) 864-8236  
Fax: (215) 864-9762  
E-mail: marriott@ballardspahr.com

-and-

Matthew G. Summers, Esquire  
Ballard Spahr LLP  
919 North Market Street, 11th Floor  
Wilmington, Delaware 19801  
Telephone: (302) 252-4428  
Facsimile: (302) 252-4466  
E-mail: summersm@ballardspahr.com

*Attorneys for Hypothekenbank  
Frankfurt AG, Hypothekenbank  
Frankfurt International S.A., Erste  
Europäische Pfandbrief- und  
Kommunalkreditbank Aktiengesellschaft  
in Luxemburg S.A*

/s/ Rick L. Frimmer

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Rick L. Frimmer  
Michael W. Ott  
SCHIFF HARDIN, LLP  
233 S. Wacker Drive, Ste. 6600  
Chicago, IL 60606  
312-258-5500  
Fax: 312-258-5600  
rfrimmer@schiffhardin.com  
mott@schiffhardin.com

*Counsel to FMS Wertmanagement*

/s/ Deborah L. Fish

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ALLARD & FISH, P.C.  
Deborah L. Fish  
2600 Buhl Building  
535 Griswold  
Detroit, MI 48226  
Telephone: (313) 961-6141  
Facsimile: (313) 961-6142  
dfish@allardfishpc.com  
P36580

- and -

KRAMER LEVIN NAFTALIS &  
FRANKEL LLP  
Thomas Moers Mayer  
Jonathan M. Wagner  
1177 Avenue of the Americas  
New York, New York 10036  
Telephone: (212) 715-9100  
Facsimile: (212) 715-8000

*Counsel to the Ad Hoc COPs Holders*

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# EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT  
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CITY OF DETROIT, MICHIGAN,	)	Case No. 13-53846
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Debtor.	)	Hon. Steven W. Rhodes
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**STIPULATED PROTECTIVE ORDER**

This matter having come before the Court upon the Stipulation of the City of Detroit, Michigan (the “City”), the Police and Fire Retirement System of the City of Detroit (“PFRS”), the General Retirement System of the City of Detroit (“GRS,” and together with PFRS, the “Retirement Systems”) and the COPs Holders; the COPs Holders having requested that the Retirement Systems’ actuary, Gabriel, Roeder, Smith & Co. provide it with the actuarial valuation member data (“census data”): (a) which was used by Gabriel, Roeder, Smith & Co. in its June 30, 2012 actuarial valuation reports for the Retirement Systems’ pension plans; (b) which was used by Gabriel, Roeder, Smith & Co. in its June 30, 2011 actuarial valuation report on retiree health benefits or OPEB; and (c) which may be used by Gabriel, Roeder, Smith & Co. in any subsequent actuarial valuation reports on the Retirement Systems’ pension plans or on retiree health benefits or OPEB for 2012, 2013, or 2014; the Retirement Systems having approved the production of the

census data requested by the COPs Holders and having determined that the data may contain personally identifiable information including, but not limited to, social security numbers, dates of birth, pension identification numbers, home addresses, home telephone numbers, and financial account numbers of pensioners; and the City and the Retirement Systems desiring to protect personally identifiable information from disclosure; and the Court finding good cause for granting the relief herein:

**IT IS HEREBY ORDERED:**

1. The COPs Holders shall keep confidential all personally identifiable information of third parties contained in any and all documents and materials that it receives from the Retirement Systems or Gabriel Roeder Smith & Co. Personally identifiable information shall include names, physical and electronic addresses, telephone numbers, social security numbers, dates of birth, pension identification numbers, financial account numbers, and any other information whose disclosure would create an undue risk of identity theft or other unlawful injury.

2. The COPs Holders shall provide their attorneys, financial advisors, actuaries and agents with a copy of the stipulated Order and obtain each such person or entity's agreement to be bound by the stipulated Order in advance of such person or entity receiving any of the census data.

3. Nothing in this Order shall be deemed to waive any objections to the production of documents that the Retirement Systems may be entitled to assert under state and federal law, including M.C.L. § 38.1140h.

4. Nothing in this Order shall be deemed to waive any privileges that the Retirement Systems may be entitled to assert, including the attorney-client, work product, and/or accountant-client privileges.

5. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.